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BEIJING BRUSSELS DUBAI FRANKFURT JOHANNESBURG
LONDON LOS ANGELES NEW YORK PALO ALTO
SAN FRANCISCO SEOUL SHANGHAI WASHINGTON

Covington & Burling LLP
One CityCenter
850 Tenth Street, NW
Washington, DC 20001-4956
T +1 202 662 6000

November 15, 2019

Via ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: WC Docket No. 19-239

Dear Ms. Dortch:

Ritter Communications Ultimate Holdings LLC (“Ritter Ultimate”), by counsel, submits this letter to notify the Commission of the *pro forma* assignment of blanket domestic Section 214 authorizations held by licensees controlled by Ritter Ultimate. The present *pro forma* assignment arises because the licensees E. Ritter Telephone Company, Inc., E. Ritter Communications, Inc., Millington Telephone Company, Inc., MTel Long Distance, Inc., and Tri-County Telephone Company, Inc. have been converted to limited liability companies, resulting in the assignment of the licenses from the former corporations to the newly converted limited liability companies: Ritter Telephone Company, LLC, E. Ritter Communications, LLC, Millington Telephone Company, LLC, MTel Long Distance, LLC, and Tri-County Telephone Company, LLC.¹

The conversions did not change the ultimate ownership or control of the domestic 214 authorizations at issue, and was therefore *pro forma* in nature. The conversions were completed on October 28, 2019.

¹ Notice is also being filed with the International Bureau regarding the *pro forma* assignment of the international 214 authorizations formerly held by E. Ritter Communications Holdings, Inc. and MTel Long Distance, Inc. which were assigned to the newly formed limited liability companies: E. Ritter Communications Holdings, LLC and MTel Long Distance, LLC.

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Any questions concerning this submission should be directed to the undersigned.

Respectfully submitted,

/s/

Thomas G. Parisi
Counsel to Ritter
Communications Ultimate
Holdings LLC

cc: Jodie May
Greg Kwan
Myrva Charles